

DOCKET SECTION

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BRADLEY (USPS-T-14) TO INTERROGATORY OF NEWSPAPER ASSOCIATION OF AMERICA (NAA/USPS-T14-19)

The United States Postal Service hereby provides the response of witness Bradley (USPS-T-14) to the following interrogatory of Newspaper Association of America: NAA/USPS-T14-19, filed on September 17, 1997. Interrogatory NAA/USPS-T14-20 was redirected.

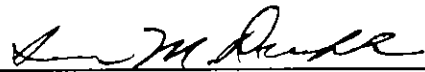
The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Susan M. Duchek

475 L'Enfant Plaza West, S.W.
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(202) 268-2990; Fax -5402
October 1, 1997

Response of United States Postal Service Witness Bradley
to
Interrogatories of NAA

NAA/USPS-T14-19. Please refer to your response to Interrogatory NAA/USPS-T14-18(c).

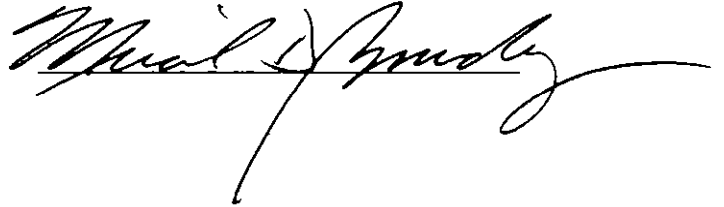
- a. On average, how many piece-handlings per day would it take to achieve 100,000 piece-handlings per accounting period?
- b. Please provide the average number of piece-handlings per accounting period for a mid-sized MODS facility by type of mail processing equipment, (BCS and OCR).
- c. How many accounting periods does it typically take for newly-installed automated equipment to achieve the 100,000 piece-handling per accounting period threshold.

NAA/USPS-T14-19 Response:

- a. Based upon 24 working days in an accounting period, I calculate a required average of 4,166.67 pieces handlings per day.
- b. As shown in Table 7 on page 54 of my testimony, for my data set, the average number of piece handlings per accounting period is for the OCR activity is 15,454,000 and the average number of piece handlings per accounting period for the BCS activity is 37,572,000.
- c. I am informed that once an automated machine has been accepted from the manufacturer, it will typically only take one or two accounting periods to reach the minimum threshold for normal operations.

DECLARATION

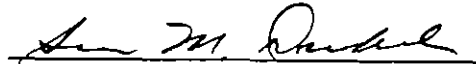
I, Michael D. Bradley, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

A handwritten signature in cursive script, reading "Michael D. Bradley", written over a horizontal line.

Dated: Sept 30, 1997

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.


Susan M. Duchek

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